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California Energy Commission
Dockets Office, MS-4
Re: Docket No.09-renewEO-01
1516 Ninth Street
Sacramento, CA 95814-5512

To Whom It May Concern:

Thank you for allowing us the opportunity to provide comments following the recent public scoping meetings. We are fully supportive of renewable energy development when that development is placed in the appropriate places. The Wildlands Conservancy (TWC) is a 501-c3 California non-profit dedicated to conserving our wild places and providing free outdoor education to our youth. TWC has installed renewable energy facilities at all of our desert preserves, two of which are off the grid and self-sustaining.

We applaud the California Energy Commission (CEC) and the Department of Fish and Game (DFG) for engaging in an open public process to determine the most responsible approach to developing renewable energy within the state while protecting California's biodiversity and conserving natural resources.

TWC is committed to this process and has submitted comments to the state-wide renewable energy planning process even though we did not secure a stakeholder position for the Steering Committee of the Renewable Energy Transmission Initiative (RETI). RETI serves an advisory board to the CEC and is tasked with making recommendations for a transmission plan for California to meet our 2020 and 2050 renewable energy goals as mandated by law and the Governor's Executive Order S-14-08. Unfortunately there have many shortcomings in the RETI process and the conclusions of RETI will be faulty.

We would like to offer the following comments to be considered by the CEC and the DFG:

- Membership of the RETI stakeholder committee: was dominated by industry, lacked any desert representation (local governments, independent scientists [i.e. UCR], land managers, etc.)
- The majority of the renewable energy applications being submitted to state and federal agencies are located within San Bernardino County. SBC does not occupy a seat on the RETI Steering Committee and thus their knowledge of the resources and land use plans was not sufficiently recognized in the process and thus the outcomes of RETI now lack credibility. SBC has invested years in multi-jurisdictional land use plans such as the West Mojave Plan (i.e. WEMO) and the expertise of local government was critical to the RETI process.
- The sensitivity of this fragile desert ecosystem was disregarded and the environmental rankings have been insufficient to date, esp. with regards to addressing endemic species, ancient plants communities' carbon sequestering, crypto biotic soil crusts, rare plants, etc.
- There have been no attempts at addressing the cumulative impacts in Mojave Desert, which is under siege from several types of development. The impacts of solar and wind farms, Military base expansions, airport construction, transmission corridors, community growth, etc need to be considered when siting and permitting renewable energy projects. Since solar industrialization is being planned on more than 1.5 million acres in the CA desert, the effects will be widespread and long-lasting in the fragile ecosystem. The edge effects on protected lands such as the National Parks and Areas of Critical Environmental Concern must be considered. Landscape-scale connectivity is also critical to the health and persistence of biodiversity in these conservation areas.
- We strongly support an independent science panel that will advise the stakeholder committee in this new Natural Communities Conservation Plan.

- The CEC has estimated that approximately 100,000 -140,000 acres of solar development in the desert alone would meet the 2020 mandate. Since renewable energy development will and must be sited throughout the state the amount of acreage sited in the California desert should be significantly less than that number.
- When mapping and identifying Competitive Renewable Energy Zones, RETI should have given fallow agricultural lands and other disturbed lands top priority over pristine public lands: This has resulted in open and pristine lands being weighted above or equal to disturbed lands and dry lakes.
- Incorrectly analyzed direct to grid power and gave un-due weight in siting CREZ in remote areas instead of weighting in favor of local/urban load centers.
- The overall assumption that large-scale remote generation (and thus transmission) will solely meet the 2020 goal is short-sited. The corresponding dismissal of technology advances in rooftop solar and photovoltaic, and other new technologies (including superconductors, large-scale storage units, etc.) is also irresponsible.
- Los Angeles Department of Water and Power, a municipal utility was represented on the RETI Stakeholder Steering Committee twice, once as LADWP and once under the Southern California Public Power Authority. For a utility that is not governed by the Public Utilities Commission or the CEC, it speaks unfavorably to the credibility of RETI's final recommendations.
- RETI has failed to calculate available transmission needs when fossil fuel energy is removed from these lines and available for renewable energy. At present the megawatts of energy produced from renewable sources is being added into the "q" so that the transmission grid is unnecessarily expanded.

Agencies, land managers & politicians are tasked with the challenge of balancing renewable energy development with other state priorities while protecting

California's treasured landscapes. It has been frustrating to see this conversation, which should be the most inspirational for conservationists, get high-jacked by industry. Currently the outcry from industry is driving the process. We encourage the CEC and the DFG to work with all stakeholders to green our state's energy supply while protecting our natural resources so that this can result in positive outcome for current and future generations.

Sincerely,

April Sall
Conservation Director, The Wildlands Conservancy

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